

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

INDICTMENT

The Grand Jury Charges:

COUNTS ONE THROUGH SIX
POSSESSING STOLEN GOVERNMENT PROPERTY
WITH INTENT TO CONVERT
[18 U.S.C. § 641]

1. On or about the dates listed below, in the District of New Hampshire and elsewhere,
the defendant,

ANGEL LAUREANO RIVERA,

did knowingly and willfully receive, conceal, and retain a record, voucher, money and a thing of value of the United States, to wit: U.S. Treasury checks listed below by check number, payee, and amount, with intent to convert said U.S. Treasury checks to his use and gain, and knowing said U.S. Treasury check to have been embezzled, stolen, purloined, and converted.

Count	Date	Check #	Payee Name	Amount
1	03/29/2012	3158 13748571	N.C.	\$4,469.00
2	03/29/2012	3158 17286480	S.S.M.	\$7,390.00
3	03/29/2012	3158 16681986	L.A.B.	\$5,434.00
4	03/29/2012	3158 07508621	M.R.O.	\$5,886.00

5	03/29/2012	3158 17286476	E.S.V.	\$8,114.00
6	03/26/2012	3158 05277993	J.M.	\$6,091.00

All in violation of Title 18, United States Code, Section 641.

The Grand Jury further charges:

COUNT SEVEN
CONSPIRACY TO CAUSE POSSESSION OF STOLEN GOVERNMENT PROPERTY
WITH INTENT TO CONVERT
[18 U.S.C. §§ 371, 641]

2. From on or about January 6, 2012, to on and about March 29, 2012, in the District of New Hampshire and elsewhere, the defendant,

ANGEL LAUREANO RIVERA,

together with others known and unknown to the Grand Jury, knowingly and willfully conspired and agreed together and with each other to commit an offense against the United States, in that the defendant and his coconspirators, did knowingly and willfully conspire and agree together and with each other to knowingly and willfully receive, conceal, and retain a record, voucher, money and a thing of value of the United States, to wit: U.S. Treasury checks with intent to convert said U.S. Treasury checks to his use and gain, and knowing said U.S. Treasury check to have been embezzled, stolen, purloined, and converted.

3. It was a part of the conspiracy that **ANGEL LAUREANO RIVERA** and his coconspirators obtained United States Treasury checks issued by the Internal Revenue Service and that reflected income tax refunds based on fraudulently filed income tax returns.

4. It was further a part of the conspiracy that **ANGEL LAUREANO RIVERA** and others procured the identity information of various citizens in whose names the above-listed U.S. Treasury checks had been issued.

5. It was further a part of the conspiracy that **ANGEL LAUREANO RIVERA** and others obtained counterfeit forms of identification, such as driver's licenses, in the names of the check payees but bearing the photographs of certain of the coconspirators.

6. It was further a part of the conspiracy that **ANGEL LAUREANO RIVERA** and the coconspirators would travel to New Hampshire and deposit or attempt to deposit the United States Treasury checks in accounts controlled by **ANGEL LAUREANO RIVERA**.

7. In furtherance of the conspiracy outlined above, one or more of the conspirators committed at the following overt act:

A. On March 29, 2012, the defendant and his coconspirators attempted to deposit United States Treasury check 3158 13748571 made payable to N.C. in the amount of \$4,469.00 at the Citizens Bank in Manchester, New Hampshire.

All in violation of Title 18, United States Code, Sections 371 and 641.

The Grand Jury further charges:

COUNTS EIGHT THROUGH THIRTEEN
AGGRAVATED IDENTITY THEFT
[18 U.S.C. §§ 1028A(a)(1)(b)&(c), 641]

4. From on or about January 6, 2012, to on and about March 29, 2012, in the District of New Hampshire and elsewhere, the defendant,

ANGEL LAUREANO RIVERA.

did knowingly possess and use, without lawful authority, a means of identification of another person, to wit, the names, the dates of birth, and the social security numbers of the individuals listed in the column below entitled “**Payee Name**”, during and in relation to felony violations of Title 18, United States Code, Section 641, as set forth in Counts One through Twelve above.

Count	Check #	Payee Name	Amount
8	3158 13748571	N.C.	\$4,469.00
9	3158 17286480	S.S.M.	\$7,390.00
10	3158 16681986	L.A.B.	\$5,434.00
11	3158 07508621	M.R.O.	\$5,886.00
12	3158 17286476	E.S.V.	\$8,114.00
13	3158 05277993	J.M.	\$6,091.00

All in violation of Title 18, United States Code, Sections 1028A(a)(1)(b) and ©, and 641.

A TRUE BILL

January 2, 2013

/s/ Foreperson
Foreperson

JOHN P. KACAVAS
United States Attorney

/s/ Alfred Rubega
Alfred Rubega
Assistant U.S. Attorney